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Before the Federal Communications Commission Washington, D.C. 20554

In the Matter of)	DOCKET FILE COPY ORIGINAL
Price Cap Performance Review) for Local Exchange Carriers)	CC Docket No. 94-1
Treatment of Operator Services) Under Price Cap Regulation	CC Docket No. 93-124
Revisions to the Price Cap) Rules for AT&T)	CC Docket No. 93-197

COMMENTS IN SUPPORT OF MOTION FOR EXTENSION OF TIME

Sprint Corporation respectfully submits these comments in support of the United States Telephone Association's ("USTA") request for a three-week extension of time to file comments and reply comments in the Fourth Further Notice of Proposed Rule Making, CC Docket No. 94-1, the X-FACTOR NPRM.

USTA's Motion for Extension of Time, which is supported by Southwestern Bell Telephone Company, the Bell Atlantic Telephone Companies, Ameritech, and, in significant part, by Pacific Bell, notes the complexity of the issues involved in this proceeding and the interrelatedness of these issues and those included in the Second Further Notice of Proposed Rulemaking in CC Docket

^{1.} Pacific Bell suggests a six-week extension of time. See, In the Matter of Price Cap Performance Review for Local Exchange Carriers; Treatment of Operator Services Under Price Cap Regulation; Revisions of Price Cap Rules for AT&T, CC Docket Nos. 94-1, 93-124 and 93-197, Order on Motion for Extension of Time, DA 95-2340, released November 13, 1995.

No. 94-1, the LEC Pricing Flexibility NPRM. Sprint agrees that critical² and complex issues are raised in the X-FACTOR proceeding and that a three-week extension of time is merited.

The X-FACTOR issue has been a difficult and highly debated matter and a significant source of contention between the Sprint local exchange companies and Sprint Corporation on the one hand and USTA on the other. Indeed, Sprint has retained expert economics support separate and apart from USTA. Sprint's experts have not been active participants in the X-FACTOR debate and a three-week extension will allow Sprint and its experts to refine and strengthen Sprint's comments. Moreover, Sprint notes that the Common Carrier Bureau has granted a three week extension of time in the LEC Pricing Flexibility NPRM. A similar extension is appropriate in this "most important common carrier policy decision."

^{2.} In describing the Commission's initial ruling in this proceeding, Commissioner Quello described it as "... perhaps the most important common carrier policy decision this Commission will have made during [Chairman Hundt's] Chairmanship." In the Matter of Price Cap Performance Review for Local Exchange Carriers, First Report and Order, FCC 95-132, CC Docket No. 94-1, released April 7, 1995 (Separate Statement of Commissioner James H. Quello).

^{3.} See footnote 1, supra.

Accordingly, Sprint urges the Commission to grant a threeweek extension of time to file comments and reply comments in this docket.⁴

Respectfully submitted,

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20 November 14, 1995

^{4.} Sprint notes that the Common Carrier Bureau's November 13 Order on Motion for Extension of Time, extends the time for filing comments on Issues 19 and 20 and paragraphs 159 through 172 in the LEC Pricing Flexibility NPRM to November 27, the current due date for comments in the X-FACTOR NPRM. Sprint requests that the date for filing such comments and for filing reply comments be extended for three weeks as well. This will provide a single, consistent filing schedule for all identified X-FACTOR issues.

CERTIFICATE OF SERVICE

I, Melinda L. Mills, hereby certify that I have on this 20 day of November, 1995, sent via U.S. First Class Mail, postage prepaid, or Hand Delivery, a copy of the foregoing "Comments in Support of Motion for Extension of Time" in the Matter of Price Cap Performance Review for Local Exchange Carriers, Treatment of Operator Services Under Price Cap Regulation, Revisions to the Price Cap Rules for AT&T, CC Docket No. 94-1, filed this date with the Acting Secretary, Federal Communications Commission, to the persons on the attached service list.

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